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Counsel for FRED HJELMESET,  
Trustee in Bankruptcy

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In re

EVANDER FRANK KANE,  
  
Debtor.

Case No. 21-50028 SLJ  
Chapter 7  
Hon. Stephen L. Johnson

**REQUEST FOR ENTRY OF ORDER  
AUTHORIZING TRUSTEE TO  
(I) EMPLOY SPECIAL COUNSEL ON  
CONTINGENCY FEE BASIS  
(II) COMPENSATE DEBTOR FOR  
ASSISTING SPECIAL COUNSEL FROM  
JUDGMENT AND/OR SETTLEMENT  
PROCEEDS, AND (III) REIMBURSE  
DEBTOR FOR EXPENSES DEBTOR HAS  
ADVANCED  
(Putterman Yu Wang LLP)**

[No Hearing Requested]

Fred Hjelmset, Chapter 7 Trustee in Bankruptcy ("Trustee") of the estate of the above-named Debtor, respectfully represents:

1. On February 14, 2022, the Trustee served on parties on the limited service list<sup>1</sup> a Notice and Opportunity for Hearing on Application for Authority to (I) Employ Special Counsel on Contingency Fee Basis (II) Compensate Debtor for Assisting Special Counsel From Judgment and/or Settlement Proceeds and (III) Reimburse Debtor for Expenses Debtor Has Advanced

<sup>1</sup> Notice was limited in this case by an order entered July 30, 2021 entitled "Order Pursuant to Bankruptcy Rule 2002(h) Designating Recipients of Notices Required Under 2002(a)," Docket 194.

1 (“Notice”) [Docket 264], as evidenced by the Certificate of Service / Declaration of Mailing [Docket  
2 265].

3           2.       Also on February 14, 2022, the Trustee filed his Application for Authority to (I)  
4 Employ Special Counsel on Contingency Fee Basis (II) Compensate Debtor for Assisting Special  
5 Counsel From Judgment and/or Settlement Proceeds, and (III) Reimburse Debtor for Expenses  
6 Debtor Has Advanced (Putterman Yu Wang LLP) [Docket 263] and supporting Declaration of  
7 George Chikovani in Support of Application for Authority to (I) Employ Special Counsel on  
8 Contingency Fee Basis, (II) Compensate Debtor for Assisting Special Counsel From Judgment  
9 and/or Settlement Proceeds, and (III) Reimburse Debtor for Expenses Debtor Has Advanced  
10 (Putterman Yu Wang LLP) [Docket 263-1], attached to which as Exhibit A was the proposed  
11 engagement agreement between the Trustee and Putterman Yu Wang LLP.

12           3.       The time period within which to file objections or requests for hearing has passed.

13           4.       Except as set forth in the Kleiner Declaration, this office has not received any  
14 objections or requests for hearing, and no objections or requests for hearing with regard to the relief  
15 requested has been filed.

16           WHEREFORE, the Trustee requests the entry of an Order authorizing him to (i) employ the  
17 law firm Putterman Yu Wang LLP on a contingency fee basis under 11 U.S.C. §§ 327(a) and 328(a),  
18 for the purposes of pursuing claims against Sure Sports, LLC *fka* Sure Sports Lending, LLC, and  
19 (ii) compensate the Debtor in an amount equal to ten percent (10%) of the Net Recovery (as defined  
20 in the Notice).

21           DATED: March 8, 2022

RINCON LAW LLP

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23           By: /s/ Gregg S. Kleiner

24           GREGG S. KLEINER

25           Counsel for FRED HJELMESET,  
26           Trustee in Bankruptcy  
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